

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

In re:) Case No. 10-26265-gmh
CHARLES DILLON and) Chapter 13
SYDNEY DILLON,)
Debtors.)

MOTION TO APPROVE DISCOUNT PAYOFF AGREEMENT

Charles and Sydney Dillon, by their attorneys, DeLadurantey Law Office, LLC, by Nathan E. DeLadurantey, respectfully request that this Court enter an order approving a “Discount Payoff Agreement” between the debtors and Ocwen Loan Servicing, LLC (“Ocwen”). A summary of the terms of the agreement are as follows:

1. The debtors shall remit \$2,000.00 to Ocwen as a payoff of Ocwen's junior lien attached to the debtors homestead property located at 5751 N Teutonia Ave, Milwaukee, WI 53209.
 2. Upon receipt of the \$2,000.00 payoff amount and compliance with the instructions found in the agreement, Ocwen shall waive the remaining balance due to satisfy the junior lien and release the debtors from further obligation.

The debtors wish to enter into the agreement according to the terms listed above, and Ocwen has stated it will not honor the agreement without an order from the Bankruptcy Court approving the agreement. Thus, the debtors request that the Court enter an order approving the agreement.

Dated: March 12, 2015.

DeLadurantey Law Office, LLC
Attorneys for Debtors

Drafted by:
Daniel T. Beasley
SBN 1092029
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(414) 377-0515; Fax (414) 755-0860
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/s/
By: Nathan E. DeLadurantey
State Bar No. 1063937

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN

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CHARLES DILLON,) Case No. 10-26265-gmh
SYDNEY DILLON) Chapter 13
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NOTICE OF MOTION TO APPROVE DISCOUNT PAYOFF AGREEMENT

PLEASE TAKE NOTICE that Attorney Nathan E. DeLadurantey, Debtor's counsel of record, has filed a "Motion to Approve Discount Payoff Agreement". If you have an objection/response to the motion, you are required to file the objection/response within fourteen (14) days of the date of this notice. Your objection/response should be filed with:

Clerk of United States Bankruptcy Court
Room 126, U.S. Courthouse
517 East Wisconsin Avenue
Milwaukee, WI 53202

You must also mail a copy of your objection/response to:

DeLadurantey Law Office, LLC
735 W. Wisconsin Avenue, Suite 720
Milwaukee, WI 53233

If you do not file a timely objection/response, the Court may sign the order approving the motion.

PLEASE TAKE FURTHER NOTICE that a hearing may be scheduled on any timely objection/response. Notice of the hearing will be provided to the objecting party and any other interested parties.

Dated: March 12, 2015.

DeLadurantey Law Office, LLC
Attorneys for Debtor

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UNITED STATES BANKRUPTCY COURT
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In re:
CHARLES R. DILLON,
SYDNEY DILLON,
Debtors.
)

) Case No. 10-26265
Chapter 13
)

CERTIFICATE OF SERVICE

Daniel Beasley states under oath that he is over the age of 18 and an attorney at DeLadurantey Law Office, LLC, attorneys for the debtors, and that on March 12, 2015, he delivered true and correct copies of the attached "Notice of Motion to Approve Discount Payoff Agreement," and "Motion to Approve Discount Payoff Agreement" and "Certificate of Service" via the CM/ECF system or first-class mail to the following parties:

Clerk, U.S. Bankruptcy Court
Eastern District of Wisconsin
via CM/ECF

Trustee Mary B. Grossman
via CM/ECF

Office of the United States Trustee
via CM/ECF

I certify under penalty of perjury that the foregoing is true and correct.

Executed on March 12, 2015.

Signed: /s/ Daniel Beasley
Daniel Beasley

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